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November 6, 2013

**BY ECF**

The Honorable Sidney H. Stein  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re: United States v. Xia Ping Wen 12 Cr. 938 (SHS)**

Dear Judge Stein:

I was recently assigned as new counsel for Ms. Wen. I write to request an adjournment of the defendant's sentencing submission date as well as the actual sentencing now respectively set for November 15, 2013 and December 5, 2013. Despite several attempts, I have been unable to procure the file from Ms. Wen's former counsel. I spoke yesterday to AUSA Brian R. Blais and advised him that I wanted to review the discovery in the case. Mr. Blais indicated he would determine who at Dupe Coop I need to contact and get back to me. I have also requested transcripts of the change of plea that Ms. Wen entered and the Curcio hearing to determine if there is any basis to withdraw Ms. Wen's plea. I have advised Ms. Wen that it is unlikely that she would be able to withdraw a plea that was entered pursuant to a plea agreement but would order the transcript.

I need also to make several objections to the PSR submitted by Senior U.S. Probation Officer Mark R. Johnson. For all of the above reasons, I request that your Honor adjourn sentencing until mid to late January and allow me additional time to submit a sentencing memorandum. AUSA Blais consents to my request for an adjournment.

Sincerely yours,

*Colleen Quinn Brady*  
Colleen Quinn Brady

Colleen Quinn Brady

cc: AUSAs Brian R. Blais and Robert Boone

SO ORDERED

*Sidney H. Stein*  
SIDNEY H. STEIN  
U.S.D.J.